



April 19, 2016

Mike Cirian, P.E.
USEPA
108 East 9th Street
Libby, Montana 59923

Re: Response to Draft Comments on the Investigation-Derived Waste Management Plan
Columbia Falls Aluminum Company, Columbia Falls, Montana

Dear Mr. Cirian:

Roux Associates, Inc. (Roux Associates), on behalf of Columbia Falls Aluminum Company (CFAC), has prepared this response to the written comments provided by the United States Environmental Protection Agency (USEPA) dated February 25, 2016 regarding the Columbia Falls Aluminum Company Remedial Investigation/Feasibility Study (RI/FS) Investigation-Derived Waste (IDW) Management Plan. Each of the comments are presented below, followed by Roux Associates' response.

- 1) Section 5.2, page 10, 1st paragraph – Please provide a detailed discussion of the soil stockpile construction details, on-site soil transport, and soil handling procedures. The paragraph states that, “soil cuttings... will be containerized and transported to a... soil stockpile...” Please specify the containers that will be used (e.g., 55-gallon drums? Roll-off bins), as well as the mode of transport (e.g., forklift? Front loader?). Please describe how soil will be transferred from containers to the stockpiles. Please discuss controls for limiting incidental contamination (e.g., geosynthetic liners on top and bottom of pile).

Four to six, 25-yard roll-off containers will be delivered to the Site and staged in the former warehouse building at the start of the project. Throughout the drilling program, soil will be transported from the drilling locations to the warehouse in 1-yard hoppers (i.e., smaller soil bins). The soil will be loaded into the hopper utilizing a skid steer or bobcat, and the hopper will be placed on the back of the support truck for transport to the warehouse. The soil will be dumped from the hopper into the roll-off containers with a bobcat or skid steer. The roll-off containers will be lined with polyethylene plastic liner (3 mil thickness) as a control for incidental contamination from the bottom of the container. The warehouse has a competent roof and contains a concrete floor slab, which will keep the material away from the elements and help control incidental contamination. The former warehouse building also has high ceilings and roll-up doorways which will allow for safely loading and unloading of soil.

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Each roll-off container will be sampled and characterized separately in accordance with the sampling described in the IDW Management Plan. As the containers are sent for disposal, additional roll-off containers will be delivered to the Site. 55-gallon steel drums will also be on-site as a contingency, if needed.

- 2) Section 5.2, page 11, 1st full paragraph, 4th sentence – Please provide discussion of how soil stockpile construction will be modified depending on its location, whether inside the warehouse, or outside.

If soil is required to be stockpiled outside of the warehouse building, roll-off containers lined with polyethylene plastic liner (3 mil thickness) will be utilized. The roll-off containers will be covered and secured with straps. 55-gallon steel drums will also be on-site as a contingency, if needed.

If soil is required to be stockpiled outside of the warehouse and on the ground, polyethylene plastic liner (6 mil thickness) will be placed on the ground prior to stockpiling and the IDW will be placed on top of the liner to limit incidental contamination. The stockpile will be covered utilizing tarps and/or additional plastic liner. The covers will be secured utilizing sandbags to prevent damage from heavy winds, rain, animals and/or other elements.

Should there be any questions or comments on this submission, please do not hesitate to contact me at (631) 232-2600.

Sincerely,

ROUX ASSOCIATES, INC.



Michael Ritorto
Senior Hydrogeologist/
RI Manager

cc: John Stroiazzo, Glencore
Steve Wright, Columbia Falls Aluminum Company
Andrew Baris, Roux Associates